UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



EPA United States Environmental Protection Office of Pesticide Programs Agency

MEMORANDUM

8/13/2018

SUBJECT: Product Chemistry Review for AQUCAR 7140 LT Water Treatment Microbiocide; EPA Reg. No. 464-IRUE; DP 446705

FROM: Sergey Alekseyev, Chemist

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THROUGH: Karen P. Hicks, Team Leader

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TO: Zeno Bain/Terria Northern

PM Team 33

Regulatory Management Branch I Antimicrobials Division (7510P)

Registrant: The Dow Chemical Company

Action code: (540) New Product; Non-Fast Track; FIFRA Sec. 2(MM) Uses

Agency Due Date: 08/06/2018

Submission No. 1017218

E-Sub No.: 27545

Formulation: EUP

Pesticide classification: antimicrobial

MRID(s): 503267-05, 503267-06, and 503267-07

PC Code	CAS No.	Name	% by
			wt.
043901	111-30-8	Glutaraldehyde (1,5-Pentatedione)	14.0
069105	68424-85-1	BTC-835 (Alkyl* dimethyl benzyl ammonium chloride	2.5
		*(50% C14, 40% C12, 10% C16))	

BACKGROUND:

The registrant, The Dow Chemical Company, requested registration of the product Reg. No. **464-IRUE**.

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 – Application for Pesticide Registration	\boxtimes	
EPA FORM 8570-27 – Formulator's Exemption Statement	\boxtimes	
EPA FORM 8570-34 – Certification with respect to citation of data	\boxtimes	
EPA FORM 8570-35 – Data Matrix, dated 03/14/2018	\boxtimes	
Cover letter, dated 03/14/2018	\boxtimes	
Transmittal document		
Proposed CSF, a basic, dated 08/09/2018	\boxtimes	
Proposed label, no date		
Certification for Pilot Fragrance Notification Program		×
REFERENCED:		•

III. FINDINGS

CONFIDENTIAL STATEMENT OF FORMULA

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated			\boxtimes	\boxtimes	
Integrated					

Active Ingredients(s)	Nominal	Upper limit	Lower limit
Glutaraldehyde (1,5-Pentatedione)	14.0	14.7	13.3
BTC-835 (Alkyl* dimethyl benzyl ammonium chloride *(50% C14, 40% C12, 10% C16))	2.5	2.6	2.6
	YES	NO	N/A
1. The certified limits of the active ingredients are within 40 CFR standard certified limits.			
2. Wider certified limits were requested and rationale was accepted.			
3. The nominal concentration(s) of the active ingredient is in agreement with the label.			
4 The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.			
5. All ingredients are approved for food use pesticide formulations.	\boxtimes		
6. The impurities present >0.1% are identified.	\boxtimes		
7. Impurities of toxicological significance have an upper certified limit.			

b. Product Label:

	YES	NO	N/A
The formula contains one of the following:			
1. 10% or more of petroleum distillate			\boxtimes
2. 1.0% or more of methyl alcohol	\boxtimes		
3. Sodium nitrite at any level	. 🗆		\boxtimes
4. A toxic list 1 inert at any level	\boxtimes		
5. Arsenic in any form			\boxtimes
6. If yes to 2-6, then the inert ingredient list contains a relevant footnote			
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label			
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.			
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.			\boxtimes

IV. ADDITIONAL FINDINGS

- 1. The basic CSF, dated 08/09/2018, is acceptable. All ingredients listed in this CSF have been cleared for using in pesticide formulation.
- 2. Storage Stability and Corrosion Characteristics studies have not been carried out. Said studies should be accomplished within 1 year.
- 3. The Physical and Chemical Hazards section of a label should include statements as follows: "Product is strong reducer! Keep away from oxidizers."

V. CONCLUSIONS:

- 1. The registrant has satisfied the basic CSF, dated 08/09/2018, requirements for registration of EPA Reg. No. **464-IRUE.** This CSF supersedes all previous basic CSFs.
- 2. Storage Stability and Corrosion Characteristics studies should be submitted within 1 year, see Additional Finding 2.

VI. Table A: Series 830 Guidelines – Group A

OPPTS#	DPPTS# Name		MRID	
830.1550	Product Identity & Composition	Y	503267-05	
830.1600	Description of Materials	Y	503267-05	
830.1620	Description of Production Process	N/A		
830.1650	Description of Formulation Process		503267-05	
830.1670	Discussion of Formation of Impurities	Y	503267-05	
830.1700 Preliminary Analysis		N/A		
830.1750	0 Certified Limits		CSF	
830.1800	00 Enforcement Analytical Method		503267-05	
830.1900	Submittal of Samples	N/A		

VII. Table B: Series 830 Guidelines – Group B

OPPTS#	Name	Study Findings/Comment	Status	MRID
830.6302	Color	Colorless	Y	503267-06
830.6303	Physical State	Liquid	Y	503267-06
830.6304	Odor	PR Notice 92-5	N/A	
830.6313	Stability to Normal & Elevated Temperatures, Metals & Metal Ions	The product is not TGAI.	N/A	
830.6314	Oxidation/Reduction: Chemical Incompatibility	The product is a strong reducer.	Y	503267-06
830.6315	Flammability	17.2 °C	Y	503267-06
830.6316	Explodability	The product is not explosive.	W	503267-07
830.6317	Storage Stability		N	
830.6319	Miscibility	The product is not to be mixed with organic components	W	Label
830.6320	Corrosion Characteristics		N	
830.6321	Dielectric Breakdown Voltage	The product is not to be used around electrical equipment.	W	Label
830.7000	рН	5.64 as is at 22.4 °C; 4.40 (1% solution) at 22.4 °C	Y	503267-06
830.7050	UV/Visible Absorption	1.54	N/A	
830.7100	Viscosity	2.3 cSt at 20 °C; 1.4 cSt at 40 °C	Y	503267-06
830.7200	Melting Point	The product is not TGAI.	N/A	
830.7220	Boiling Point	The product is not TGAI.	N/A	
830.7300	Density/Bulk Density	0.897 g/ml at 20 °C	Y	503267-06
830.7370	Dissociation Constants in Water	The product is not TGAI.	N/A	
830.7520	Particle Size	The product is not TGAI.	N/A	
830.7550/ 7560/ 7570	Partition Coefficient	The product is not TGAI.	N/A	
830.7840/ 7860	Water Solubility	The product is not TGAI.	N/A	
830.7950	Vapor Pressure	The product is not TGAI.	N/A	

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived